

DENNIS M. PRINCE, ESQ.  
Nevada Bar No. 5092  
TRACY A. EGLET, ESQ.  
Nevada Bar No. 6419  
ROBERT M. ADAMS, ESQ.  
Nevada Bar No. 6551  
**EGLET PRINCE**  
400 South 7th Street, 4th Floor  
Las Vegas, Nevada 89101  
Tel.: 702-450-5400  
Fax: 702-450-5451  
E-mail [eservice@egletlaw.com](mailto:eservice@egletlaw.com)  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KEONI PAUL KULOLOIA,  
Plaintiff,

vs.

OHIO SECURITY INSURANCE  
COMPANY; LIBERTY MUTUAL GROUP,  
INC. dba LIBERTY MUTUAL INSURANCE  
COMPANY dba LIBERTY MUTUAL;  
LIBERTY MUTUAL AUTO AND HOME  
SERVICES, LLC; LIBERTY MUTUAL  
INSURANCE COMPANY aka LIBERTY  
MUTUAL INSURANCE CO.; DOES 1  
through X; and ROE CORPORATIONS I  
through X, inclusive,  
Defendants.

CASE NO.: 2:18-cv-00405-JCM-PAL

**STIPULATION AND ORDER TO**  
**EXTEND PLAINTIFF'S TIME TO FILE**  
**OPPOSITION TO DEFENDANTS'**  
**MOTION TO DISMISS**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED between Plaintiff, KEONI PAUL KULOLOIA and Defendants, OHIO SECURITY INSURANCE COMPANY, LIBERTY MUTUAL GROUP, INC. dba LIBERTY MUTUAL, LIBERTY MUTUAL AUTO AND HOME SERVICES, LLC, and LIBERTY MUTUAL INSURANCE COMPANY aka LIBERTY MUTUAL INSURANCE CO., by and through the parties' respective counsel, pending the Court's approval, the date for Plaintiffs to file their opposition to Defendant's Motion to Dismiss Plaintiff's Complaint to be extended from March 27, 2018 to April 3, 2018. The Motion was filed on March 13, 2018.

The purpose of requesting this extension is due to the recent Easter and Spring Break holidays and the complexities of the legal issues raised in Defendants' Motion.

In light of these issues, pending the Court's approval, counsel for Defendants has graciously agreed to a one-week extension, through and until April 3, 2018, for Plaintiff to file an Opposition to Defendants' Motion to Dismiss the Complaint in this matter. This is the first extension requested in connection with the underlying motion and the parties do not anticipate requesting another extension as it relates to the instant motion. The parties understand the need to complete the briefing of this Motion. Therefore, the parties respectfully request that this Court approve the foregoing stipulation.

DATED this 26th day of March, 2018

DATED this 26th day of March, 2018

/s/ Robert M. Adams  
 DENNIS M. PRINCE, ESQ.  
 Nevada Bar No. 5092  
 TRACY A. EGLET, ESQ.  
 Nevada Bar No. 6419  
 ROBERT M. ADAMS, ESQ.  
 Nevada Bar No. 6551  
**EGLET PRINCE**  
 400 South 7th Street, 4th Floor  
 Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

/s/ Casey G. Perkins  
 CASEY G. PERKINS, ESQ.  
 Nevada Bar No. 12063  
**FORAN GLENNON PALANDECH  
 PONZI & RUDLOFF, PC**  
 2200 Paseo Verde Parkway, Suite 280  
 Henderson, Nevada 89052  
 -and-  
 AMY S. SAMBERG, ESQ.  
 Nevada Bar No. 10212  
**FORAN GLENNON PALANDECH  
 PONZI & RUDLOFF, PC**  
 Two North Central Avenue, 18th Floor  
 Phoenix, Arizona 85004  
*Attorneys for Defendant Ohio Security  
 Insurance Company, also erroneously sued as  
 Liberty Mutual Group, Inc. dba Liberty  
 Mutual Insurance Company dba Liberty  
 Mutual, Liberty Mutual Auto and Home  
 Services, LLC, and Liberty Mutual Insurance  
 Company dba Liberty Mutual Insurance Co.*

**ORDER**

**IT IS SO ORDERED.**

Dated March 28, 2018.

  
 UNITED STATES DISTRICT JUDGE